

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No: 10-MJ-389 (SRN)

In the Matter of Search Warrant  
For 2911 Park Avenue, Minneapolis, MN 55407  
Issued September 23, 2010

In the Matter of Search Warrant  
For 1823 Riverside Avenue, #2  
Minneapolis, MN 55454  
Issued September 23, 2010

**Affidavit of Jessica R. Sundin**

I, Jessica R. Sundin, being duly sworn on oath, hereby state and affirm:

1. My name is Jessica R. Sundin. On September 24, 2010, I was a resident of 2911 Park Avenue, Minneapolis, MN 55407, and the owner of personal property seized on that date by the Federal Bureau of Investigation (“FBI”) pursuant to the search warrant issued in this matter.
2. In September of 2010, I was a board member of the Anti-War Committee (“AWC”) and I remain a board member of the AWC at this time. Both from my home, and from the offices of the AWC at 1313 5<sup>th</sup> Street SE, #112C, Minneapolis, MN 55414, the FBI seized AWC membership lists, lists of persons who had donated money to the AWC, and various petitions circulated by the AWC which contained the names of persons signing those petitions in support of political and issue campaigns conducted by the AWC. These various lists were

contained on computers seized by the FBI and on paper documents seized by the FBI.

3. The FBI also seized journals, letters, contact lists, and other documents, detailing personal and political contacts that I have had over a period of years. These documents contain both personal and intimate thoughts and expressions and also relate to my activities which are protected under the First Amendment.
4. Although the FBI has returned the physical documents and computers which were seized, the FBI has made and retained copies of all documents seized and made and retained copies of the hard drives and other data storage units in the computers which were seized.
5. I desire to bring a Motion for Return of Property at a future date, seeking the return of all copies of data and documents retained by the FBI. The retention of such data and documents by the FBI infringes on the associational rights of the AWC and of myself, under the First Amendment. Further, both I and the AWC have a property interest in the copies of data and documents seized by the FBI, and the content of the information seized, which is protected by the Fourth Amendment. I require a copy of the Application for Search Warrant and supporting affidavits in this matter in order to bring such an action, based in part on the contention that the warrants were issued without probable cause, that the supporting application and affidavits contained materially false statements, and that the items seized exceeded the scope of the warrant.

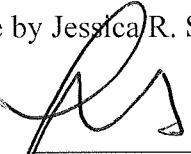
6. I also desire to bring a civil action at a future date, asserting a violation of my rights under the First and Fourth Amendments, pursuant to Bivens v. Six Unknown Named Agents, 403 U.S. 388 (1971). I require a copy of the Application for Search Warrant and supporting affidavits in this matter in order to bring such an action, based in part on the contention that the warrants were issued without probable cause, that the supporting application and affidavits contained materially false statements, and that the items seized exceeded the scope of the warrant.
7. Since September 24, 2010, I have generally continued to engage in political speech, association, and petitioning my government for redress of grievances, despite fear that such protected activity will be used by the United States against me in a future criminal prosecution. However, because I do not know the full extent and basis of why my home was searched and why I was targeted for investigation by the United States, I have not engaged in international travel or contact with persons abroad, with the exception of family visits, because I fear that such contact will cause persons with whom I have contact to be subjected to harm. Because I have not engaged in such travel, my ability to gather information about the effects of United States foreign policy has been curtailed, as has my ability to seek to change such policy. Unless and until I am able to see the Application for Search Warrant and supporting affidavits in this matter, and understand the full nature and basis for the investigation of my activities, I will continue to not engage in such associational activity protected under the First Amendment.

8. On information and belief, other persons and organizations have limited their joint political contact and work with myself and the AWC because the nature of the government investigation of myself and the AWC is not fully known. Fear caused by the continuing secret nature of this investigation has had a chilling effect on the willingness of others to work with myself and the AWC and limited my ability to engage in activities protected by the First Amendment.

Date: 1/14/14

  
Jessica R. Sundin

Sworn and subscribed to before me by Jessica R. Sundin this 14 day of January 2014.

  
Notary Public, State of Minnesota

